

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Michael Geiger

Plaintiff

vs.

Law Office of Vincent P. Cignarale, LLC

Defendant

)

) Civil Action No. 10-5068

)

) **REQUEST TO ENTER DEFAULT**

) of Law Office of Vincent P. Cignarale, LLC

) Fed. R. Civ. P. 55(a)

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA:**

Plaintiff, MICHAEL GEIGER, by and through his attorney, Brent F. Vullings, Esquire, requests that the Clerk of this Court enter the default of LAW OFFICE OF VINCENT P. CIGNARALE, LLC, Defendant, for failure to plead or otherwise defend in a timely manner, as provided by Rule 55 (a) of the Federal Rules of Civil Procedure.

This request is based on the attached Affidavit of Brent F. Vullings, Esquire, Attorney for Plaintiff, which shows:

1. Defendant was served with the Civil Action Complaint and Summons in a Civil Action on October 15, 2010.
2. The Certificate of Service filed with this Court on October 25, 2010 establishes that service was proper pursuant to Rule 4 of the Federal Rules of Civil Procedure. A copy of the Certificate of Service and Notice of Electronic Filing of same, is attached to the Affidavit of Bruce K. Warren, Esquire, as Exhibit "A"
3. Defendant has failed to plead or otherwise respond to the Civil Action Complaint.

4. The applicable time limit for responding has expired.
5. Defendant is not an infant or an incompetent person.

Dated: December 17, 2010

Warren & Vullings, LLP

BY: 

Brent F. Vullings, Esquire
Attorneys for Plaintiff

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